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Attorney for Defendant Wells Fargo Bank, N.A.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANICE DARKO,

Plaintiff,

vs.

GREEN DOT CORPORATION; WELLS
FARGO BANK, N.A.

Defendants.

Case No. 2:25-cv-00741-JCM-DJA

**JOINT MOTION TO EXTEND DEADLINE
TO RESPOND TO COMPLAINT**

[THIRD REQUEST]

THIS JOINT MOTION is entered into by and between Defendant Wells Fargo Bank, N.A.
 (“Wells Fargo”) and Plaintiff Janice Darko (“Darko”, and together with Wells Fargo, the “Parties”),
 by and through their respective counsel of record, to extend Wells Fargo’s deadline to respond to
 Plaintiff’s Complaint from June 20, 2025 until July 11, 2025 based on the following:

1. Plaintiff filed the Complaint on April 28, 2025.
2. Plaintiff served the Summons and Complaint on Wells Fargo on May 1, 2025.
3. Based on the date of service of the Summons and Complaint, Wells Fargo’s original
deadline to respond to the Complaint was May 22, 2025.
4. On May 20, 2025, the Parties filed a stipulation to extend the deadline for Wells
Fargo to respond to the Complaint until June 5, 2025 [ECF No. 8], which the Court granted. [ECF
No. 10.]
5. On June 3, 2025, the Parties filed a second stipulation to extend the deadline for

1 Wells Fargo to respond to the Complaint until June 20, 2025¹ [ECF No. 14], which the Court
2 granted. [ECF No. 15.]

3 6. The Parties continue discussing early resolution options that may resolve all claims
4 pled by Darko against Wells Fargo. To allow the Parties sufficient opportunity to further discuss
5 resolution options without the need to expend resources, the Parties stipulate and agree to a further
6 extension for Wells Fargo to respond to the Complaint.

7 **NOW, THEREFORE**, based on the foregoing and subject to Court approval, the Parties
8 agree as follows:

9 1. The Parties stipulate and agree to extend the deadline for Wells Fargo to respond to
10 the Complaint, up to and including **July 11, 2025**, to allow the Parties sufficient time to evaluate
11 early resolution options.

12 2. This extension request is sought in good faith and is not made for the purpose of
13 delay.

14 **IT IS SO STIPULATED.**

15 Dated: June 20, 2025

16 SNELL & WILMER L.L.P.

17 /s/ Jennifer B. Lustig

18 Kelly H. Dove, Esq.

19 Nevada Bar No. 10569

20 Jennifer B. Lustig, Esq.

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22 1700 South Pavilion Center Drive, Ste. 700

23 Las Vegas, Nevada 89135

24 *Attorneys for Defendant Wells Fargo Bank,*
25 *N.A.*

Dated: June 20, 2025

LAW OFFICE OF KEVIN L. HERNANDEZ

/s/ Kevin L. Hernandez

Kevin L. Hernandez, Esq.

Nevada Bar No. 12594

8920 W. Tropicana Ave., Suite 101

Las Vegas, NV 89147

Attorneys for Plaintiff Janice Darko

26 **ORDER**

27 Upon Joint Motion of the Parties, and good cause appearing therefor,

28 **IT IS HEREBY ORDERED** that Defendant Wells Fargo Bank, N.A., shall have until July
11, 2025 to file a response to the Complaint.

¹ The Parties stipulated to extend the deadline until June 19, 2025, which was a Court holiday. As such, the current deadline to respond to the Complaint expires on June 20, 2025.

Dated: 6/23/2025

UNITED STATES MAGISTRATE JUDGE

*Attorneys for Defendant Wells Fargo Bank,
N.A.*

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2025 I electronically filed the foregoing **JOINT MOTION TO EXTEND DEADLINE TO RESPOND TO COMPLAINT [THIRD REQUEST]** with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED June 20, 2025.

/s/ Joanna Fung
An employee of SNELL & WILMER L.L.P

Snell & Wilmer

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